



► HVAC/R Performance Products
► Indoor Air Quality Products
► Training / Certifications

09/24/2015

MASSOUD HEIDARY
121 CENTRAL AVE
GAITHERSBURG, MD 20877

Thank you for choosing Mainstream Engineering Corporation for your HVAC Certification needs. As you may already know, Mainstream offers a wide variety of additional HVAC certifications at www.epatest.com. All of the manuals and software at this web site are free.

- Green HVAC/R Technician - Training and certification in Green HVAC/R Technician techniques including: energy audits; energy-saving equipment; system design, installation, and servicing; hazardous chemical handling; and the financial and environmental incentives for energy conservation.
- R-410A - Free training and **free certification** in R-410A refrigerant service techniques including: installing new units, evacuation requirements, storage requirements, safety requirements, HCFC phase-out scheduling, and answers to frequently asked questions.
- Indoor Air Quality - Training and certification in Indoor Air Quality including information on: implementing Indoor Air Quality improvements and servicing, adjusting, inspecting, and cleaning the HVAC network of ducting, heat exchangers, condensate pans, humidifiers and blowers.
- Preventative Maintenance - Free training and **free certification** in preventative maintenance services including: acid and moisture detection, acid removal, water removal, compressor maintenance, coil maintenance, ~~proper~~ refrigeration charging techniques, advanced diagnosis, and leak testing procedures.

Sincerely,

Missy Tucker
Customer Service
Mainstream Engineering Corporation
(800) 866-3550

Certificate No. 244

Fairfax County, Virginia



ELECTRICAL CONTRACTOR CERTIFICATE

This is to Certify that

NAME M & H IMPROVEMENTS & CONSTRUCTION, INC.
ADDRESS 934 Ellsworth Drive, Silver Spring, Maryland 20910
NAME OF MASTER ELECTRICIAN Massoud Heidary CERT. NO. 244 M

HAS QUALIFIED AS AN ELECTRICAL CONTRACTOR, SUBJECT TO THE RULES AND REGULATIONS OF THE FAIRFAX COUNTY (VIRGINIA) ELECTRICAL CODE ADOPTED BY THE BOARD OF SUPERVISORS OF FAIRFAX COUNTY, AT ITS REGULAR MEETING, September 10, 1979, and as amended.

THIS CERTIFICATE EXPIRES MARCH 1, 1982, UNLESS SOONER REVOKED OR DULY RENEWED.

THIS CERTIFICATE IS NOT TRANSFERABLE

Tom R. Boone
Building Official

J. E. Calach
For the Electrical Examiners

EMEI-20 (Rv.1/81)

844 Rockville Pike
Rockville, MD 20852
T (301) 424-0000 - Fax (301) 217-0007



Circuit Court for Montgomery County, Maryland
Office of the Assignment Commissioner

50 Maryland Avenue, Room 1003
Rockville, Maryland 20850
(240) 777-9000

June 1, 2021

Notice of Hearing Date

(437)

Case# 484817-V

MASSOUD HEIDARY vs. MONTGOMERY COUNTY, ET AL

This is to notify you that the above entitled case has been set for the events indicated.

Event Date	Time	Description	Length
07/20/2021	10:00 AM	MOTION TO DISMISS (#12)	30 Minutes

This proceeding is subject to a 30 minute time limit under Maryland Rule 16-201. If this is the first time this matter has been scheduled, it may be rescheduled by a letter of agreement within 15 days of the date of this notice. A Motion for Postponement is required for all other requests.

Please consult the monitors on the lobby level for your courtroom assignment.

Handicap parking for the Montgomery County Circuit Court is located along Maryland Avenue near its intersection with Courthouse Square.

Please direct all inquiries to the Assignment Office.

Possession and use of cell phones, computers, other electronic devices, and cameras may be limited or prohibited in designated areas of the court facility. The use of any camera, cell phone, or any electronic device for taking, recording, or transmitting photographs, videos, or other visual images is prohibited in the court facility at all times unless the court expressly grants permission in a specific instance.

MASSOUD HEIDARY
121 CENTRAL AVENUE
GAITHERSBURG MD 20877



Circuit Court for Montgomery County, Maryland
Office of the Assignment Commissioner

50 Maryland Avenue, Room 1003

Rockville, Maryland 20850

(240) 777-9000

April 22, 2021

Notice of Removal of Hearing Date

(7/8)

Case# 484817-V

MASSOUD HEIDARY vs. MONTGOMERY COUNTY, ET AL

Please be advised that the following events have been removed from the Court's calendar:

Event Date	Time	Description	Length
12/09/2021	02:00 PM	SETTLEMENT CONF. (RET. JUDGE)	

Please direct all inquiries to the Assignment Office.

Possession and use of cell phones, computers, other electronic devices, and cameras may be limited or prohibited in designated areas of the court facility. The use of any camera, cell phone, or any electronic device for taking recordings, or transmitting photographs, videos, or other visual images is prohibited in the court facility at all times unless the court expressly grants permission in a specific instance.

MASSOUD HEIDARY
121 CENTRAL AVENUE
GAITHERSBURG MD 20877

CIRCUIT COURT FOR MONTGOMERY, MARYLANDLocated at _____ Case No. 484817-V

Court Address _____

Plaintiff MASSOUD HEIDARY vs. Defendant CITY GAITHERSBURGAddress 12 CENTRAL AVE Address _____City, State, Zip GAITHERSBURG MD 20877 Telephone 3016331115 City, State, Zip _____ Telephone _____

E-mail _____ E-mail _____

FORM 22. NOTICE OF APPEAL

(Md. Rule 8-201)

MASSOUD HEIDARY notes an appeal to the Court of Special Appeals in the
Appealing party's name

above-captioned action.

12/15/2021
Date**RECEIVED**

DEC 15 2021

Clerk of the Circuit Court
Montgomery County, Md.

Signature of Appealing Party/Attorney _____ CPF ID No. _____

MASSOUD HEIDARY
Printed Name12 CENTRAL AVE
AddressGAITHERSBURG MD 20877
City, State, Zip3016331115
TelephoneMASSOUD HEIDARY@yahoo.com
E-mail

CERTIFICATE OF SERVICE

I certify that I served a copy of this notice upon the following party or parties by ☐ electronic filing
☐ hand delivery ☒ mailing first-class mail, postage prepaid on 12/16/2021 to:
DateCITY GAITHERSBURG
NameGAITHERSBURG MD 20877
Address_____
City, State, ZipGAITHERSBURG
City, State, Zip_____
Address2245 PARKWAY DR
Address_____
City, State, ZipHANOVER MD 21076
City, State, Zip12/15/2021
Date_____
Signature of Party Serving



Barbara H. Meiklejohn
Clerk of the Circuit Court for Montgomery County, Maryland
50 Maryland Avenue
Rockville, Maryland 20850-2397
February 19, 2021

RE: Notice of New Case Number for
MASSOUD HEIDARY vs MONTGOMERY COUNTY, ET AL
Reference Case#: N/A
Case Type: VIOLATION
(836)

Dear Sir/Madam:

Please be advised that the above referenced case was received on February 19, 2021, in the office of the Clerk for Montgomery County. This matter has been assigned case number 484817-V. Please include this case number on all future papers to be filed in this case.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barbara H. Meiklejohn', written over a horizontal line.

Clerk of the Circuit Court
for Montgomery County,
Maryland

MASSOUD HEIDARY
121 CENTRAL AVENUE
GAITHERSBURG MD 20877

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

MASSOUD HEIDARY

Plaintiffs

v.

PARADISE POINT, LLC, *et. al.*

Defendants

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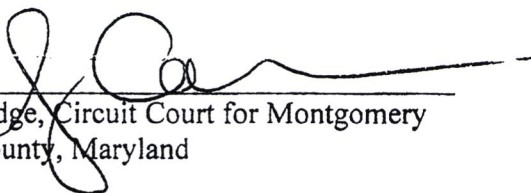
Civil No. 484817-V

ORDER

Upon consideration of the Motion to Extend Time to Respond to Complaint filed by Defendant, Montgomery County, any Opposition thereto, it is this 10th day of May 2021, by the Circuit Court for Montgomery County, Maryland,

ORDERED that Defendant's Motion be, and the same hereby is, **GRANTED**; and it is further

ORDERED that Defendant Montgomery County, Maryland must file a response to Plaintiff's Complaint on or before May 3, 2021, *DE #12 is deemed timely filed.*



Judge, Circuit Court for Montgomery
County, Maryland

Copies to: All parties

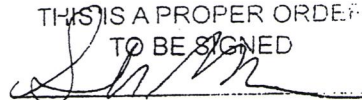
ENTERED

MAY 11 2021

4

Clerk of the Circuit Court
Montgomery County, Md.

THIS IS A PROPER ORDER
TO BE SIGNED



SARAH I. MALIK
SPECIAL MAGISTRATE



Circuit Court for Montgomery County, Maryland
Office of the Assignment Commissioner

50 Maryland Avenue, Room 1003
Rockville, Maryland 20850
(240) 777-9000

April 22, 2021

Notice of Removal of Hearing Date

(7/8)

Case# 484817-V

MASSOUD HEIDARY vs. MONTGOMERY COUNTY, ET AL

Please be advised that the following events have been removed from the Court's calendar:

Event Date	Time	Description	Length
12/09/2021	02:00 PM	SETTLEMENT CONF. (RET. JUDGE)	

Please direct all inquiries to the Assignment Office.

Possession and use of cell phones, computers, other electronic devices, and cameras may be limited or prohibited in designated areas of the court facility. The use of any camera, cell phone, or any electronic device for taking recording, or transmitting photographs, videos, or other visual images is prohibited in the court facility at all times unless the court expressly grants permission in a specific instance.

MASSOUD HEIDARY
121 CENTRAL AVENUE
GAITHERSBURG MD 20877

MASSOUD HEIDARY,
Appellant,
v.
CITY OF GAITHERSBURG,
Appellee.

* IN THE
* COURT OF SPECIAL APPEALS
* OF MARYLAND
* No. 1620 September Term, 2021
* MDEC: CSA-REG-1620-2021
* (Cir. Ct. No. 484817V)

* * * * *

ORDER

Upon consideration of the appellant's January 27, 2022 "Response to Order to Show Cause," it is this 3rd day of February 2022, by the Court of Special Appeals,

ORDERED that this Court's January 12, 2022 Order to Show Cause is satisfied and the appeal shall proceed.¹



THE CHIEF JUDGE'S SIGNATURE
APPEARS ON THE ORIGINAL OF
THIS DOCUMENT

Matthew J. Fader, Chief Judge

¹ In his response, the appellant states that he has been unable to obtain a copy of his notice of appeal to attach to his Civil Appeal Information Report. The Court has a copy of the notice in the case file.



GREGORY HILTON,
CLERK

Court of Special Appeals

Robert C. Murphy Courts of Appeal Building
361 Rowe Boulevard
Annapolis, Maryland 21401-1699

(410)260-1450 WASHINGTON AREA 1-888-200-7444

SUMMARY NOTICE

MASSOUD HEIDARY v. CITY OF GAITHERSBURG

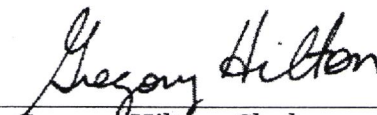
Case Number: CSA-REG-1620-2021

Circuit Court Number: 484817V

Date: 6/16/2022

Dear Counsel and Parties:

The referenced case shall be decided without oral argument in the July 2022 session.



Gregory Hilton, Clerk

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

MASSOUD HEIDARY

Plaintiffs

v.

PARADISE POINT, LLC, *et. al.*

~~Defendants~~

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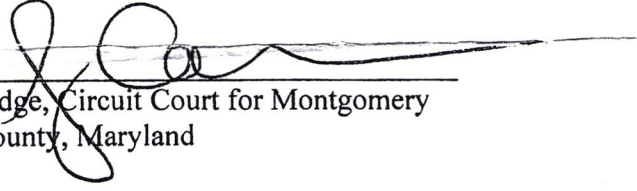
Civil No. 484817-V

ORDER

Upon consideration of the Motion to Extend Time to Respond to Complaint filed by Defendant, Montgomery County, any Opposition thereto, it is this 10th day of May 2021, by the Circuit Court for Montgomery County, Maryland,

ORDERED that Defendant's Motion be, and the same hereby is, **GRANTED**; and it is further

ORDERED that Defendant Montgomery County, Maryland must file a response to Plaintiff's Complaint on or before May 3, 2021, *DE #12 is deemed timely filed.*



Judge, Circuit Court for Montgomery
County, Maryland

Copies to: All parties

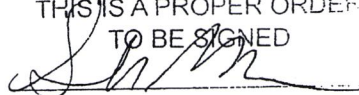
ENTERED

MAY 11 2021

4

Clerk of the Circuit Court
Montgomery County, Md.

THIS IS A PROPER ORDER
TO BE SIGNED



SARAH I. MALIK
SPECIAL MAGISTRATE

Massoud Heidary
121 Central Avenue
Gaithersburg, MD 20877

January 24, 2020

Hon. Robert A. Greenberg.
Administrative Judge
Circuit Court for Montgomery County
50 Maryland Avenue
Rockville, MD 20850

Dear Judge Greenberg:


My name is Massoud Heidary. I was the plaintiff in Case Number 415350V back in 2016. I started the case representing myself but then retained counsel. My attorney, Anthony V. Parker, Esq., entered his appearance on July 22, 2016. On October 6, 2016, my case was dismissed. On October 12, 2016, you sent me a notice of dismissal and that I had a certain amount of time to file a motion to vacate the dismissal.

Because I was represented, I believe that this notice should have gone to Mr. Parker, not to me. Please tell me whether the notice was sent to Mr. Parker, and if not, why not. I think the clerk made a mistake by sending the notice to me.

I also had another related case, against the City of Gaithersburg, Case Numbers 419529V and 430300V. Because that case was going on at the same time, I was unable to meet all deadlines in case 415350V against Montgomery County. Both the case against the City of Gaithersburg and the case against Montgomery County involved the same property.

I would like to spend a few minutes telling you the rest of the story and explaining the mistakes that I think were made in these cases.

Very Truly Yours,


Massoud Heidary

RECEIVED

APR 16 2018

BY COURT OF SPECIAL APPEALS

IN THE
COURT OF SPECIAL APPEALS
OF MARYLAND

September Term, 2016

No. 2000

MASSOUD HEIDARY

Appellant,

v.

PARADISE POINT LLC, ET AL.

Appellees.

Appeal from the Circuit Court for Montgomery County
(The Honorable Nelson W. Rupp, Jr.)

APPELLANT'S MOTION
FOR RECONSIDERATION

MASSOUD HEIDARY
121 Central Avenue
Gaithersburg, MD 20877
Phone: xxx-xxx-xxxx
Appellant, *Pro se*

IN THE
COURT OF SPECIAL APPEALS
OF MARYLAND

RECEIVED
JUL 11 2018
BY COURT OF SPECIAL APPEALS

September Term, 2017

No. 649

MASSOUD HEIDARY

Appellant,

v.

CITY OF GAITHERSBURG

Appellee.

Appeal from the Circuit Court for Montgomery County
(The Honorable Sharon Burrell)

APPELLANT'S MOTION
FOR RECONSIDERATION

MITCHELL J. SHAPIRO, ESQ.
Shapiro & Shapiro, P.C.
1335 Rockville Pike, Suite 220
Rockville, MD 20852
Phone: 301-309-1775
ShapiroPC@aol.com
Counsel for Appellant

Massoud Co.

IN THE
COURT OF SPECIAL APPEALS
OF MARYLAND

September Term, 2017

No. 649

MASSOUD HEIDARY

Appellant,

v.

CITY OF GAITHERSBURG

Appellee.

Appeal from the Circuit Court for Montgomery County
(The Honorable Sharon Burrell)

APPELLANT'S MOTION
FOR RECONSIDERATION

MITCHELL J. SHAPIRO, ESQ.
Shapiro & Shapiro, P.C.
1335 Rockville Pike, Suite 220
Rockville, MD 20852
Phone: 301-309-1775
ShapiroPC@aol.com
Counsel for Appellant

Attachment #2

MASSOUD HEIDARY
PLAINTIFF

vs.

Case No.: 415350-V

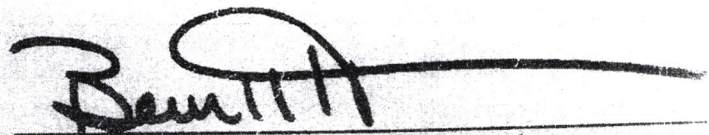
MONTGOMERY COUNTY MARYLAND, ET AL
DEFENDANT

NOTICE OF DISMISSAL
(1475)

The above-captioned case having been set for a hearing or trial on
October 6th, 2016, the court dismissed the case on that date as
follows:

COURT (RUPP, J.) GRANTS DEFENDANT'S PARADISE POINT LLC AND DANSIE &
DANSIE LLP'S MOTION AND MEMORANDUM OF GROUNDS AND AUTHORITIES IN
SUPPORT FOR DISMISSAL OF PLAINTIFF'S FIRST AMENDED COMPLAINT (DE #13).

You may move to vacate the Dismissal within thirty (30) days of the
date the case was dismissed.



Clerk of the Circuit Court for
Montgomery County, Maryland

FILED

NOTICE

JUN 13 2014

Clerk of the Circuit Court
Montgomery County, Md.

ORDER OF POSTING

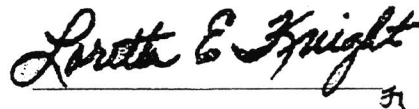
The object of this proceeding is to secure the foreclosure of all rights of redemption in all that parcel of land situated in Montgomery County, Maryland, designated as DEER PARK 9679/787 located at 303 S FREDERICK AVENUE.

The Complaint states, among other things, that the amounts for redemption have not been paid, although more than six (6) months and one (1) day from the date of sale has expired.

Pursuant to Maryland Rule 14-503(c) the Plaintiff shall cause the Sherrieff of Montgomery County to post a Notice in a conspicuous place on the property described as:

DEER PARK 9679/787 located at 303 S FREDERICK AVENUE

IT IS THEREUPON, this 13 day of June, 2014, by the Circuit Court for Montgomery County, Maryland: **ORDERED** that this notice be posted on the property by the Sheriff for a period of thirty (30) days, warning all persons interested in the said property to be and appear in this Court by the 12 day of August, 2014, and redeem the property and answer the Complaint, or thereafter a Judgment will be rendered foreclosing all rights of redemption in the property, and vesting in the Plaintiff a title, free and clear of all encumbrances.



LORETTA E. KNIGHT
CLERK OF THE CIRCUIT COURT
50 MARYLAND AVENUE
ROCKVILLE, MD 20850-2393

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

Paradise Point LLC
c/o Lucas I. Dansie
406 5th Street NW
Washington, DC 20001

Case No. 391038V

Plaintiff,

v.

Massoud Heidary
121 Central Avenue
Gaithersburg, MD 20877

and

Montgomery County, Maryland
Serve: Joseph F. Beach, *Director*
Department of Finance
255 Rockville Pike, Suite L-15
Rockville, MD 20850

ENTERED

OCT 16 2014

Clerk of the Circuit Court
Montgomery County, Md.

and

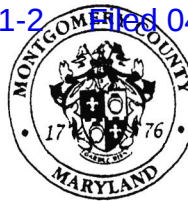
Montgomery County, Maryland
(for Maryland Annotated Code 14-836(b)(1)(v) purposes only)
Serve: Marc P. Hansen, *County Attorney*
Executive Office Building
101 Monroe St., 3rd Floor
Rockville, MD 20850

Defendants

and

All unknown owners of property described below, their heirs, devisees and personal representatives and their or any of their heirs, devisees, executors, administrators, grantees, assigns, or successors in right, title and interest and any and all persons having or claiming to have an interest in said property which is described as:

DEER PARK 9679/787 located at 303 S FREDERICK AVENUE



DEPARTMENT OF PERMITTING SERVICES

Isiah Leggett
County Executive

May 21st, 2015

Diane R. Schwartz Jones
Director

Pepco and Delmarva Power C&I
Energy Savings Program
C/o Lockheed Martin,
9231 Corporate Boulevard,
Rockville, MD 20850

Re: Pepco Trade Ally Network
Pepco C&I Energy Savings Program

To whom it may concern,

On April 13th, 2015 a contractor, who performs electrical work as a member of the Pepco Trade Ally Network, requested to appear before the Montgomery County Board of Electrical Examiners to address issues as to the quality and safety of work being completed by Trade Allies on Pepco's behalf. The contractor informed the Electrical Board that much of the LED replacement work being completed as part of the Energy Savings Program is being done so without permits or inspections. The contractor also raised an issue with the safety of the work itself, specifically as to the gauging of the wiring to the old lighting devices in comparison to the higher voltage LED lighting which can potentially create a fire hazard.

The Electrical Board of Examiners requires an electrical permit to be pulled. The quality of electrical work and the safety of resident's within the county is the Electrical Board and the Department of Permitting Services main priority.

To schedule a time to meet with the Electrical Board of Examiners or if you have any other questions going forward, you may contact the staff liaison (240)-777-6294 from 7:30 a.m. to 4:00 p.m., Monday thru Friday. Thank you for your cooperation in these matters.

Sincerely,

Donald Steinman
Montgomery County Electrical Board
of Examiners Liason Chairman
255 Rockville Pike, 2nd floor
Rockville, MD 20850-4416
<http://www.montgomerycountymd.gov/permittingservices/>

cc: Diane Schwartz Jones – Permitting Services Director
Phil Waclawski – CBO Permitting Services Manager
Michael Raffael – Senior Commercial Electrical Plan Reviewer
Adam J. Bigenho – Permit Tech Electrical Board Liason
Massoud Heidary – M & H Lighting



Massoud Heidary <massoud1.mh@gmail.com>

Pepco Meeting / New Technology for Fixtures

Mon, May 4, 2015 at 3:53

mavera@pepco.com <mavera@pepco.com>
 To: Massoud Heidary <massoud1.mh@gmail.com>
 Cc: wrellis@pepco.com, mark.l.bailey@lmco.com, kim.a.byk@lmco.com

Mr. Heidary,

Thank you for explaining your innovative wiring solution to improve the safety of LED retrofitted fixtures. We applaud you for looking to improve practices used in the electrical trades.

Pepco and Delmarva Power are committed to saving energy and costs for our customers with the C&I Energy Saving Programs. We also are always diligent and focused on safety throughout our business. While we see potential benefits in your idea, the local building codes, standards and practices are developed and promulgated through national, state and local groups responsible for the electrical design and construction industry, not the local utilities.

We recommend that you discuss your idea with lighting manufacturers, electrician unions, Underwriter Laboratories (UL), and code organizations to identify peers in the field who may be commonly aligned with your objectives. You have clearly invested a good deal of thought and effort in developing this innovative idea, but we need to work with the appropriate decision-makers to include this as a product option, installation best practice or an actual change to a building and electrical code.

When you succeed in commercializing the product we can consider it within the collaborative utility working group as an installation requirement and make a decision for inclusion in future programs.

Thank you for your participation and innovation!

Manuel Vera

From: Massoud Heidary <massoud1.mh@gmail.com>
 To: mavera@pepco.com
 Date: 04/30/2015 12:57 PM
 Subject: Pepco Meeting / New Technology for Fixtures

[Quoted text hidden]

This Email message and any attachment may contain information that is proprietary, legally privileged, confidential and/or subject to copyright belonging to Pepco Holdings, Inc. or its affiliates ("PHI"). This Email is intended solely for the use of the person(s) to which it is addressed. If you are not an intended recipient, or an employee or agent responsible for delivery of this Email to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this Email is strictly prohibited. If you have received this message in error, please immediately notify the sender and permanently delete this Email and any copies. PHI policies expressly prohibit employees from making defamatory or offensive statements and infringing any copyright or other legal right by Email communication. PHI will not accept any liability in respect of such communication.



COURT OF SPECIAL APPEALS

CASE SUMMARY

CASE NO. CSA-REG-1620-2021

CASE ASSIGNMENT

MASSOUD HEIDARY v. CITY OF GAITHERSBURG, et alCase Type: **Appeal of Civil Case**Case Status: **Open**Case Financial Balance: **\$0.00**

Court Address:

Judicial Officer:

Assigned On: **12/16/2021**Filed On: **12/16/2021**

Related Cases

484817V

Case Appealed

Cross Reference Numbers

EVENTS

12/15/2021	Notice of Appeal - Civil
12/16/2021	Correspondence
01/12/2022	Order - Show Cause Issued
01/27/2022	Answer
01/27/2022	Civil Information Report
02/03/2022	Order
02/14/2022	Order to Proceed
04/14/2022	Record Received
04/14/2022	Briefing Notice
05/23/2022	Appellant Brief
	Party Appellant HEIDARY, MASSOUD
06/07/2022	Appellee Brief
	Party Appellee CITY OF GAITHERSBURG
06/16/2022	Scheduling Notice
06/21/2022	Order - Show Cause Issued
06/21/2022	Appellee Brief
	Party Appellee Montgomery County, Maryland

Certificate of Service Form

RECEIVED

SEP 20 2022

BY THE COURT OF SPECIAL APPEALS

CERTIFICATE OF SERVICEI HEREBY CERTIFY that on this 12 day of 12, 20 22, a copy
[month] [year]of the foregoing CERTIFIED MAIL RECEIPT
[name of document]

was served by (check one)

- ☐ 1. hand;
☐ 2. first-class mail, postage prepaid;
☒ 3. certified mail; or
☐ 4. other _____
 [specify]

on the following: [give name(s) and complete addresses of all parties in the case, or their attorneys if represented by counsel, to whom the document was served upon]

MONTGOMERY COUNTY
101 MONROE
CITY OF GAITHERSBURG
31 SOUTH SUMMIT

[your signature]

[your address]

121 CENTRAL AVE
GAITHERSBURG
MD 20877

Plaintiff:

Massoud Heidary
121 Central Ave
Gaithersburg, MD 20877

Vs.

Montgomery County Gov't Maryland
255 Rockville Pike
Rockville, MD 20850

Paradise Point LLC
406 5th Street NW.
Washington, DC 20001

To whom it may concern:

I Massoud Heidary paid the real estate tax in 2011 for tax year 2011 for the following property: 303 South Frederick Ave, Gaithersburg MD 20877. Due a tree falling on the building, I lost a lot of the documentation that were related to the RE tax. In 2014 I received a letter from the Montgomery County Tax Office that I had not made my payment. Immediately after getting the letter I went to the Montgomery County Maryland Tax Office to rectify this issue. I was instructed by Seth A. Agbeshe that I need to contact Dansie and Dansie LLP as they bought the lein or taxes owed.

After talking to Dansie and Dansie LLP, I immediately sent them a check in the amount of \$2,225.28 for the amount they requested (please their letter). I received the release letter from them on July 14th /15th of 2014. This letter stated that I was now able to pay the delinquent taxes.

I took the release letter and all corresponding information to the Montgomery County Tax Office to pay the delinquent RE Taxes. When I spoke to the Montgomery County Rep, I was told that I needed to pay 2011, 2012, 2013 and 2014 Taxes. I told the rep. that I had already paid the 2011 taxes. Then I was instructed that I needed to go to the Baltimore Office to further discuss this with them.

I went to the Assessment and Taxation Office in Baltimore. I spoke with the rep. at the Baltimore Office and I explained to her my situation. She collect my personal information i.e. name, social, address etc. They told me that they would be contact with me. 3 days late I contacted them again, I was instructed to go to the Rockville Office. I went to the Rockville Office. I spoke with them and they said they had to contact Dansie and Dansie - that was Aug 2nd or Aug 3rd. I personally called Dansie and Dansie LLP several times but I got the run around. All they said is we will get back to you. After 3 weeks with no correspondence, I decided to hire an attorney and I was instructed that I / We can file an appeal. This case went to a special appeal. After the appeal decision, I realized what was happening.

Paradise Point LLC and their Attorney Dansie and Dansie LLP are acting in a very decipetive manner. I made every effort to comply with their requests. They knew that I was in need and that I was low on



MANDATE - STATEMENT OF COSTS

Court of Special Appeals of Maryland

CSA-REG-0824-2021

Massoud Heidary v. Montgomery County, et al

Appellant

Massoud Heidary	Notice of Appeal	50.00
	RPIF	11.00
	Filing Fee - Lower Court	61.00
	Brief	84.48
	Transcript/Stenographer Costs	38.50
	Appellant Total	244.98

Appellee

Montgomery County	Brief	90.24
	Appellee Total	90.24
	Total Costs	335.22

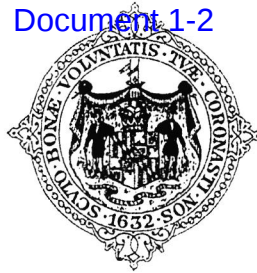
STATE OF MARYLAND, ss:

I do hereby certify that the foregoing is truly taken from the records and proceedings of the said Court of Special Appeals.

In testimony whereof, I have hereunto set my hand as Clerk and affixed the seal of the Court of Special Appeals this 6th day of June, 2022.

Greg Hilton
Clerk of the Court of Special Appeals of Maryland

Costs shown on this Mandate are to be settled between counsel and NOT THROUGH THIS OFFICE.



State of Maryland

**DEPARTMENT OF
ASSESSMENTS AND TAXATION**

(240)314-4530

mont@dat.state.md.us

ROBERT E. YOUNG
Director

09 00836687
HEIDARY MASSOUD
121 CENTRAL AVENUE
GAITHERSBURG MD 20877

Dear Property Owner:

This office is required by law to value real property for assessment purposes every three years. To accomplish this we consider the cost to reproduce or replace the property less depreciation, a comparison and analysis of recent sales of similar properties, and in the case of rental or income-producing properties, a fair and reasonable capitalization of the income attributable to the property.

Under Tax-Property Article, § 8-1 05(b) the Supervisor of Assessments is authorized to collect income and expense information from income producing properties. This information is used in valuing property by the capitalization of income method. To obtain reliable information and to assist in the uniform valuation of incoming-producing properties, you are requested to submit income and expense information for your property, by May 15 of this year. All pertinent information for the property should be entered. Each calendar year's financial data should be separated and entered on the applicable line. Expense items such as payroll and management expenses, apply only to those expenses incurred in the operation of the property (i.e. janitors, maintenance workers, etc.) and not to those costs relating to other businesses activities occurring at the property. Please fill in the form as accurately and completely as possible. The information should be returned to the address shown below.

This form seeks information pertaining to the financial operations of the property identified. This information may be considered to be a "personal record" for individuals completing the form, as defined in State Government Article, § 10-624. Consequently, you have the statutory right to inspect your file and to file a written request to correct or amend any information you believe to be inaccurate or incomplete. Additionally, personal information provided to the State Department of Assessments and Taxation is not generally available for public review. The income and expense information supplied on this form will be held strictly confidential except when disclosure is required to appeal or defend a valuation at the Maryland Tax Court level (Tax-Property Article, § 14-201 (b) (2)). This information is available to officers of the State, county or municipality in their official capacity and to taxing officials of any State or the federal government, as provided by statute. Additionally, if your property would be used by the State Department of Assessments and Taxation as a comparable for purposes of establishing the value of another property in a hearing before the Maryland Tax Court, the requested information or a portion thereof, may be provided to the owner of that other property.

FORM
HTC-60



State of Maryland
Department of Assessments and Taxation
Homeowners' Property Tax Credit Application

240 **20**

Please Read Instructions Before Completing This Application Answer Every Question Or Mark It Non

1. <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <u>Massoud</u> Last Name <u>Heidary</u> First Name and Middle Initial	2. Your Social Security Number <u>212-42-2831</u>	3. Your Birth Date <u>4-5-49</u>	4. Daytime Telephone No. <u>301 633</u>
5. Full Name of Spouse or Co-Owner living in the property <u>3-25</u>	6. His/Her Social Security Number	7. His/Her Birth Date	
8. Property Address (Number and Street, or Rural Route) <u>823 Central Avenue</u>	City, Town, or Post Office <u>Baltimore</u>	County <u>MD</u>	Zip Code <u>21</u>
9. Mailing Address if Different from Above (Attach explanation why)	City, Town, or Post Office	County	Zip Code
10. Marital Status <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Separated <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed If so, date _____			
11. Furnish the Following from Your Tax Bill or Assessment Notice	Property Account No. (except Balto. City)	Ward	Sect
		Block	Lot
		Incorporated Town, if Any	

For Baltimore City Only

TURN OVER TO OTHER SIDE TO COMPLETE AND SIGN THE APPLICATION

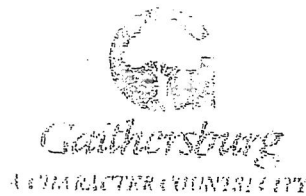
DO NOT WRITE BELOW - OFFICE USE ONLY

2014 JUL 25 P 2:24
RECEIVED
OFFICE OF THE
COMPTROLLER
OF THE TREASURY
Name

Massoud & Heidary
121 Central Avenue
Gaithersburg, MD 20877

Co. Code <u>16</u>	Mun. Code	Account Number <u>090202419</u>
Applicant's Name		
Premise Address		
Md Entry		
Applicant's Birth Date MO / YR	<input type="checkbox"/> STATUS <input type="checkbox"/> HOLD HARMLESS	Total Assessment 2014/2015
Social Security #1	<input type="checkbox"/> USE <input type="checkbox"/>	Appl. #
Social Security #2	Property Description	Homesite & Dwelling
		Homestead Credit

10A



May 15, 2014

VIA HAND DELIVERY &
CERTIFIED MAIL # 7011 3500 0001 8698 9329

Mr. Massoud Heidary
121 Central Avenue
Gaithersburg, MD 20877

Dear Mr. Heidary,

This letter summarizes the May 7, 2014 meeting with City staff and provides a summary of the rules and regulations which must be complied with moving forward. The following people were in attendance:

Massoud Heidary, Property Owner
Steve Allen, Neighboring Property Owner/Attorney – Attended in capacity of neighbor
Rob Robinson, Long Range Planning Manager
Kevin Roman, Neighborhood Services Division Chief
Allen Meyer, Code Administration Officer II
Lynn Board, City Attorney
Lauren Pruss, Planning Division Chief
Trudy Schwarz, Community Planning Division Chief
John Schlichting, Director of Planning and Code Administration
Cindy Hines, Assistant to the City Manager

City staff provided the following list of property maintenance issues:

- **Unapproved outdoor seating** – The Use and Occupancy (U&O) permit (Attachment #1) provides that the use of the property “is restricted to an off-site catering business with limited on site carry out restaurant” and allows for 28 interior seats, and one of the Planning Commission’s conditions on the Amendment to Final Plan Review for Change of Use and Parking Lot Expansion, dated October 6, 2010, (Attachment #2) was that the “carry-out restaurant use shall be limited to 10 percent of the floor area of the building with incidental seating permitted.” Currently, the outdoor seating is in violation.

Action required: *All outdoor seating must be removed from the property.*

City of Gaithersburg • 31 South Summit Avenue, Gaithersburg, Maryland 20877-2038
410 258-6100 • FAX 410-948-6149 • TTY 410 258-6130 • cityhall@gailthersburgmd.gov • www.gaithersburgmd.gov

MAYOR
Sidney A. Katz

COUNCIL MEMBERS
Iud Ashman
Gabby C. Drzyzga
Dorey E. Marzullo, Jr.
Michael A. Sesora
Ryan Spiegel

CITY MANAGER
Tony Tomasello



September 2, 2014

355 Grill LLC
r/a Massoud Heidary
303 South Frederick Avenue
Gaithersburg, MD 20877

RE: Municipal Infraction No. 6Z39908833

Dear Owner/Agent:

According to our records, Municipal Infraction Citation No. 6Z39908833, issued on July 25, 2014, to 355 Grill LLC in the amount of \$1000.00, has not been paid. A copy of the citation is enclosed.

You are hereby notified if the citation is not satisfied within fifteen days from the date of this notice, the fine will double and the City of Gaithersburg will request adjudication through District Court.

Your cooperation is requested. If you should have any questions, please direct them to me at 301-258-6340.

Sincerely,



Kevin Roman
Neighborhood Services Division Chief
Planning and Code Administration

kr/lr
CNS-2811-2014

Enclosure

cc: Ivan Humberson, Fire Marshal

City of Gaithersburg • 31 South Summit Avenue, Gaithersburg, Maryland 20877-2038
301-258-6300 • FAX 301-948-6149 • TTY 301-258-6430 • cityhall@gaitthersburgmd.gov • www.gaitthersburgmd.gov

MAYOR
Sidney A. Katz

COUNCIL MEMBERS
Jud Ashman
Cathy C. Drzyzgula
Henry F. Marraffa, Jr.
Michael A. Sesma
Ryan Spiegel

CITY MANAGER
Tony Tomasello

①



OFFICIAL RECEIPT

MONTGOMERY COUNTY, MARYLAND
DEPARTMENT OF FINANCE
DIVISION OF TREASURY

2011

COUNTY ☒

OUTSIDE ☐

Received From: Heidar, Massoud

To redeem 19 _____

To redeem 20 11

Tax Sale - Item R

Account No.: 00836687

Tax Sale Amount \$ 3,710.⁰⁰

Interest 46.⁷⁶

Legal Expenses _____

Overpayment _____

TOTAL \$ 3,756.⁸¹

Dash

PAID

JUL 05 2011

DEPT. OF FINANCE
MONTGOMERY CO., MD
CASHIER 4

[Signature]

GREEN
Tax Sale

PINK
Cashier

YELLOW
Customer



March 30, 2016

Via Certified and Regular Mail

Massoud Heidary
121 Central Avenue
Gaithersburg, MD 20877

Re: 303 S. Frederick Avenue
Gaithersburg, MD 20877

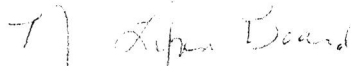
Dear Mr. Heidary:

The City of Gaithersburg was conveyed ownership of the real property located at 303 S. Frederick Avenue, Gaithersburg, Maryland on March 23, 2016 from Paradise Point, LLC. At the time the City took possession of this property, a number of items of personal property remained on the property.

As a prior owner of the property, the City is providing you with the opportunity to claim any of the personal property located on the premises to which you have an ownership interest. In order to do so, please contact Kevin Roman, Neighborhood Services Division Chief, at 301-258-6340 or kroman@gaitthersburgmd.gov to make arrangements to remove these items from the premises within thirty (30) days of this letter, or by April 29, 2016. Please note that the property is posted No Trespassing so that any access to the property without making arrangements with Mr. Roman will be considered an unlawful entry onto the property. Any items that remain on the premises at the end of this thirty (30) day period will be deemed abandoned and will be disposed of by the City.

Should you have any questions about this matter, please do not hesitate to contact me.

Sincerely,


N. Lynn Board

Cc Chief Mark Sroka
Kevin Roman
Robert F. Haddad
Lucas I. Dansie, Esquire

City of Gaithersburg • 31 South Summit Avenue, Gaithersburg, Maryland 20877-2038
301-258-6300 • FAX 301-948-6149 • cityhall@gaitthersburgmd.gov • www.gaitthersburgmd.gov

MAYOR
Jud Ashman

COUNCIL MEMBERS
Neil Harris
Henry F. Marraffa, Jr.
Michael A. Sesma
Ryan Spiegel
Robert T. Wu

CITY MANAGER
Tony Tomasello

SUBCOMMITTEE ON FINANCIAL INSTITUTIONS
AND CONSUMER CREDIT

SUBCOMMITTEE ON OVERSIGHT AND
INVESTIGATIONS

JOINT ECONOMIC COMMITTEE

WASHINGTON OFFICE:
1632 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
PHONE: (202) 225-2721
FAX: (202) 225-2193



JOHN K. DELANEY
CONGRESS OF THE UNITED STATES
6TH DISTRICT, MARYLAND

DISTRICT OFFICES:

GAITHERSBURG
9801 WASHINGTONIAN BOULEVARD
SUITE 330
GAITHERSBURG, MARYLAND 20878
PHONE: (301) 926-0300
FAX: (301) 926-0324

HAGERSTOWN
6 WEST WASHINGTON STREET
SUITE 210
HAGERSTOWN, MARYLAND 21101
PHONE: (301) 733-2900
FAX: (301) 926-0324

WEBSITE: [HTTP://WWW.DELANEY.HOUSE](http://WWW.DELANEY.HOUSE)

June 11, 2014

Mr. Massoud Mike Heidary
121 Central Avenue
Gaithersburg, MD 20877-1219

Dear Mr. Heidary:

Thank you for visiting my District Office concerning the zoning issue related to your carry-out business located at 303 South Frederick Avenue. Mr. Samuels, of my staff whom you have met, discussed the issue at length with Gaithersburg Assistant City Manager Cindy Hines. Ms. Hines was well acquainted with your case.

It is my understanding that the correspondence from the City of Gaithersburg to you dated May 15, 2014 outlines prescribed remedies for your particular zoning issues. Inasmuch, it appears to be in your best interest to continue to work with the City of Gaithersburg to implement the recommended actions set forth in the May 15, 2014 correspondence. Please understand that these requirements apply to everyone who desires to operate a business such as yours within the City of Gaithersburg.

Thank you for giving me the opportunity to assist you. I wish you well as you seek to expand your business and I know that working closely with the City of Gaithersburg and abiding by local zoning ordinances you will be able to fulfill your business plan.

Sincerely,

A handwritten signature in black ink, appearing to read "John K. Delaney".

John K. Delaney
Member of Congress

JKD/js

Senior Internet \$ Month

Frugal Consumer

Patents by Inventor Massoud Mike Heidary

Massoud Mike Heidary has filed for patents to protect the following inventions. This listing includes patent applications that are pending as well as patents that have already been granted by the United States Patent and Trademark Office (USPTO).

Charging system for an electric vehicle

Patent number: 11535116

Abstract: An Electric Vehicle (EV) charging system and method is disclosed. The system includes EV with a battery, charge control device, a portable transponder, a charging station with energy management device, a cable, a transmitter. The vehicle ID and SoC information is received from the vehicle, and the information is transmitted to the internet server along with charging station ID. The portable transponder is registered with the internet server which includes transponder ID and associated vehicles or vehicle IDs. Once the request for payment authorization is received from the charging station by the server, the server verifies the information and approves or denies the request. Upon approval of the request, the charging can commence. The portable transponder can be used for charging a second vehicle, as long as the second vehicle is also registered with the server.

Type: Grant

Filed: September 13, 2021

Date of Patent: December 27, 2022

Inventor: Massoud Mike Heidary

Fire protection system with fan shut off, including a camera and a display unit

Patent number: 10380862

Abstract: The invention relates to system for suppressing the fire and warning to the occupants are disclosed. The described system includes a thermostat and Fan in an HVAC interface with a residential HVAC system, a receiver operable to receive a signal indicating the presence of a fire or smoke, and a processor in communication with the receiver and in response, sends a signal to the HVAC interface to cause the residential HVAC system to be shut down. In addition the system also includes camera system sending signal to a display unit displaying the floor and room number on the screen, thus warning the occupants the location of the fire.

Type: Grant

Filed: September 17, 2018

Date of Patent: August 13, 2019

Inventor: Massoud Mike Heidary



UNITED STATES PATENT AND TRADEMARK OFFICE

UNITED STATES DEPARTMENT OF COMMERCE
 United States Patent and Trademark Office
 Address: COMMISSIONER FOR PATENTS
 P.O. Box 1450
 Alexandria, Virginia 22313-1450
 www.uspto.gov

APPLICATION NUMBER	FILING or 371(c) DATE	GRP ART UNIT	FIL FEE REC'D	ATTY. DOCKET NO.	TOT CLAIMS	IND CLAIMS
18/831,448	01/30/2025		686		5	1

Massoud Mike Heidary
 121 Central Ave.
 Gaithersburg, MD 20877

CONFIRMATION NO. 6929
FILING RECEIPT



OC000000085072140

Date Mailed: 02/28/2025

Receipt is acknowledged of this non-provisional utility patent application. The application will be taken up for examination in due course. Applicant will be notified as to the results of the examination. Any correspondence concerning the application must include the following identification information: the U.S. APPLICATION NUMBER, FILING DATE, NAME OF FIRST INVENTOR, and TITLE OF INVENTION. Fees transmitted by check or draft are subject to collection.

Please verify the accuracy of the data presented on this receipt. If an error is noted on this Filing Receipt, please submit a written request for a corrected Filing Receipt, including a properly marked-up ADS showing the changes with strike-through for deletions and underlining for additions. If you received a "Notice to File Missing Parts" or other Notice requiring a response for this application, please submit any request for correction to this Filing Receipt with your reply to the Notice. When the USPTO processes the reply to the Notice, the USPTO will generate another Filing Receipt incorporating the requested corrections provided that the request is grantable.

Inventor(s)

Massoud Mike Heidary, Gaithersburg, MD;

Applicant(s)

Massoud Mike Heidary, Gaithersburg, MD;

Power of Attorney: None

Domestic Applications for which benefit is claimed - None.

A proper domestic benefit claim must be provided in an Application Data Sheet in order to constitute a claim for domestic benefit. See 37 CFR 1.76 and 1.78.

Foreign Applications for which priority is claimed (You may be eligible to benefit from the **Patent Prosecution Highway** program at the USPTO. Please see <http://www.uspto.gov> for more information.) **- None.**
Foreign application information must be provided in an Application Data Sheet in order to constitute a claim to foreign priority. See 37 CFR 1.55 and 1.76.

Permission to Access Application via Priority Document Exchange: Yes

Permission to Access Search Results: Yes

Applicant may provide or rescind an authorization for access using Form PTO/SB/39 or Form PTO/SB/69 as appropriate.

79742



DEPARTMENT OF ASSESSMENTS AND TAXATION

Homeowners' / Renters' Tax Credit Program

December 4, 2014

Heidary Massoud
121 Central Avenue
Gaithersburg, MD 20877

Dear Mr. Massoud,

The Department's records indicate that you were present in Homeowners' Tax Credit office located at 301 W. Preston Street Room 900 in Baltimore on July 25, 2014. You advised us that you were referred to our office by the Montgomery County Treasury Division. If we can be of further assistance please call our office at 410-767-4433 or 1-800-944-7403 toll free within Maryland.

Sincerely,

Silma Raymond
Homeowners' Tax Credit Program
Silma Raymond, Program Manager



Administrative Specialist I
Department of Finance
Treasury Division
255 Rockville Pike, Suite L-15
Rockville, Maryland 20850
240-777-8986
240-777-8947 FAX

candice.courtney@montgomerycountymd.gov



SETH A. AGBESHIE
Revenue Collections Manager

Department of Finance
Treasury Division
255 Rockville Pike, Suite L-15
Rockville, Maryland 20850
240-777-8975
240-777-8996 FAX
240-777-8956 TTY

seth.agbeshie@montgomerycountymd.gov

THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM

SUNTRUST Official Check 4862028739
VOID OVER 2,225.28 87.275/642
4434882-UMQYD JULY 03, 2014

Non-Negotiable \$2,225.28
TWO THOUSAND TWO HUNDRED TWENTY FIVE DOLLARS AND 28 CENTS

Pay To The Order Of ***** PARADISE POINT LLC *****
Purchaser ***** MASSOUD HEIDARY *****
Memo 630018 (8/12)

Customer Copy
Non-Negotiable

This Is Not A Check - Customer Copy - This Is Not A Check

From: Massoud Heidary
121 Central Avenue,
Gaithersburg, Md 20877

To:
6500 Cherrywood Lane
Greenbelt, MD 20770

Regarding: My complaint

April 2, 2025

Dear Honorable Sir/Madam:

I am writing to file my complaints with your respected office about my loss of business and property located at 303 South Frederick Avenue, Gaithersburg, Md 20877. I am a 77 years old man with 50 years of hard work experience in this great county, which as a citizen I am very proud of.

I am filing this complaint to your honorable office to get your assistance to get a fair judgement on my disputes with the City of Gaithersburg and Montgomery County who unjustly have possessed my property located at the above address. I filed a complaint with special appeal court of Maryland as stated here. My first complaint to their office was the removal of the settlement conference which was done on 12/09/2021 (the case supposed to go to settlement with Jury trial); this removal was done in spite of the order of Court of Special Appeals to go forward.

My second complaint is that the City of Gaithersburg and Montgomery County converted my case number 484817-v to three different cases (which caused me a problem, because at the same time, it is not permitted to have three cases in the special appeal court). Dividing a case to three different cases resulted in a situation where the timing issue for each case become a problem. Montgomery County claimed that I didn't file my response on a timely manner, whereas according to original case, before splitting, my response was on time. Separating my case to three different cases created a gap between the timing, whereas the original case didn't have this problem.

As a result of their unjust actions, they took possession of my property located at the above address without any compensation to me; and now the City of Gaithersburg has my property.

At the age of 77, with the stress which has been generated by this case, with heart problems, I am very much in desperate help from your good offices. I request your good offices to look into my complaint, because I am on the verge of being very poor and seeking welfare assistant after 50 years of hard work as a businessman and inventor. I worked so hard and registered four patents in the field of electrical engineering (copies attached). Looking forward to hear from your good offices.

1. Attached please find copies of my correspondences and tax payments to Montgomery County.
2. Attached please find copies of my communication with the Department of Assessment and Taxation
3. Attached Please find certificate of the service form to Montgomery County and the City of Gaithersburg
4. Attached please find copies of all other communications (each year) with related parties including Montgomery County, City of Gaithersburg and Paradise Point LLC
5. Attached please find copies of my credentials as a certified electrician, inventor and other accomplishments.

As I stated I am desperately in the need of your assistance to receive a fair and just ruling on my case. I hate to see myself to end up on well fair roll after so many years of hard work in this great community. My American dream has gone to a feeling of desperation and disappointment.

Best Regards:


Massoud Heidary

From: Massoud Heidary
121 Central Avenue
Gaithersburg, Maryland 20877
Massoud1.mh@gmail.com

February 18, 2025
By: Hand-delivered

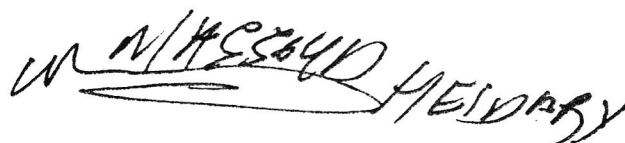
**United States Court of Appeal for Federal Circuit
717 Madison Place, NW
Washington DC 20439**

Re: Heidary v. Amazon.com, Inc & Ring LLC, Case No. 24-1580

A brief history of my background:

I am a 74 years master electrician with expertise in multiple areas including HVAC systems, and other related electrical engineering activities and residential and commercial constructions.

I was a successful businessman in IT and electrical engineering field with my own property and real estate. In 2014 due to mistakes committed by tax agency in Montgomery County of Maryland, I lost everything that I owned. I was a contractor with Pepco, which I identified several problems with newly used LED Lights and I recommended certain changes with the help of Maryland commissioner and engineers from Lockheed Martins to Pepco cooperation. For Pepco's case unfortunately I didn't register my invention and I couldn't file a claim. I learned from that mistakes and I patented my new two inventions including smoke detector with the camera system and monitoring and display system. I also have patented a charging system for Electrical Vehicles. I also recently I have applied for two new inventions (see attachment), one is a mobile Windmill system for EV cars and the other one is a system facilitating multi-floor communication with video interface. Unfortunately, due to my of financial situation, I cannot hire an attorney to assist me and, as you can see I haven't benefited from my inventions. I am very appreciative to the fact that the respected judges have changed my case from dismissal to rule 41. I am respectfully requesting the court protect my rights from Amazon and Ring LLC. I respectfully request a rehearing of my case with all the involved judges based on rule EN-BNC. I am extremely grateful to the judicial system allowing me to request this rehearing (I have dedicated almost 50 years of my life to this great country and I worked and contributed positively to this nation, it is very unfair at this old age to be forced to go to well fair for my survival) .

A handwritten signature in black ink, appearing to read 'MASSOUD HEIDARY', with a horizontal line drawn underneath the name.

Plaintiff:

Massoud Heidary

121 Central Ave

Galthersburg, MD 20877

Vs.

Montgomery County, Maryland

Montgomery County, Maryland
255 Rockville Pike MD 20850
To whom it may concern: Rockville

To whom it may concern: *Rockville*

COMPLAINING

Case #1550
NEW CASE

THE CASE

24 JUL 1965

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1997-1998

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2020 2021

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ရန်ကုန်မြို့

934 935 936

I Massoud Heidary paid the real estate tax in 2011 for tax year 2011 for the following property: 303 South Frederick Ave, Gaithersburg MD 20877. Due a tree falling on the building, I lost a lot of the documentation that were related to the RE tax. In 2014 I received a letter from the Montgomery County Tax Office that I had not made my payment. Immediately after getting the letter I went to the Montgomery County Maryland Tax Office to rectify this issue. I was instructed by Seth A. Agbeshe that I need to contact Dansie and Dansie LLP as they bought the laln or taxes owed.

After talking to Dansie and Dansie LLP, I immediately sent them a check in the amount of \$2,225.28 for the amount they requested (please their letter). I received the release letter from them on July 14th /15th of 2014. This letter stated that I was now able to pay the delinquent taxes.

FILED
2012
JAN 10 PM 4:03
CLERK OF COURT
BALTIMORE, MARYLAND

the release letter and all corresponding information to the Montgomery County Tax Office to pay the delinquent RE-Taxes. When I spoke to the Montgomery County Rep, I was told that I needed to pay 2012, 2013 and 2014 Taxes. I told the rep. that I had already paid the 2011 taxes. Then I was instructed that I needed to go to the Baltimore Office to further discuss this with them.

Went to the Assessment and Taxation Office in Baltimore. I spoke with the rep. at the Baltimore Office and I explained to her my situation. She collect my personal information i.e. name, social, address etc. They told me that they would be contact with me. 3 days late I contacted them again, I was instructed to go to the Rockville Office. I went to the Rockville Office. I spoke with them and they said they had to contact Dansie and Dansie - that was Aug 2nd or Aug 3rd. I personally called Dansie and Dansie LLP several times but I got the run around. All they said is we will get back to you. After 3 weeks with no correspondence, I decided to hire an attorney and I was instructed that I / We can file an appeal. This case went to a special appeal. After the appeal decision, I realized what was happening.

Paradise Point LLC and their Attorney Dansie and Dansie LLP are acting in a very decipetive manner. I made every effort to comply with their requests. They knew that I was in need and that I was low on cash. They knew I needed to pay 17k -18k but didn't disclose that. They even delayed sending the forms on purpose. They played this trick so they can acquire the property via an auction.

This is unfair and I believe it's also illegal. I talked to many attorney in MD, DC and Virginia, all stated that this was common and that these companies prey on people like me. (If the judge knew that I paid them, they wouldn't have put the property on the auction)

MASOOD HEDARY

2/28/16

E 7

30-633-1115

2016 FEB 29 PM 1:35